

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DANIEL POOLE,)	
)	
Plaintiff,)	
)	
v.)	No. 07 C 6355
)	
VILLAGE OF BURBANK, a Municipal)	Judge Bucklo
Corporation, VILLAGE OF BURBANK POLICE)	
DEPARTMENT OFFICERS KARA KUSH,)	
Star No. 119, and GREGORY PEROVICH,)	
Star No. 134, sued in their individual and official)	
Capacities as officers of the Village of Burbank)	
Police Department,)	
)	
Defendants.)	

AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER

The defendants, by and through their attorneys, LOUIS F. CAINKAR, LTD., move this honorable court, pursuant to Fed. R. Civ. Pro. 26(c)(2), to enter an agreed protective order in the form attached hereto as Exhibit "A." In support of this motion, the defendants state as follows:

1. The parties to the instant action are presently involved in exchanging written discovery. Defendants have sought the identity and the personal information of employees and customers of Burlington Coat Factory Warehouse of Burbank, Inc. ("BCF"), which in the interests of the privacy of those individuals, must be designated as and kept confidential.

2. Counsel for BCF has agreed to produce copies of certain documents to counsel for the defendants, subject to a protective order which would ensure that the information is treated as confidential, used solely for the instant litigation, and not disclosed to third parties except in limited circumstances provided for in the Order.

3. Counsels for the parties and BCF have reviewed the proposed protective order and have no objection to the same.

4. Accordingly, counsel for defendants submits as Exhibit "A" an agreed protective order and seek entry of such order by this court.

WHEREFORE, the parties move that the instant motion be granted and that an agreed protective order, in the form attached as Exhibit "A", be entered.

Respectfully submitted,

S/ Joseph Cainkar
One of Their Attorneys

Joseph Cainkar
LOUIS F. CAINKAR, LTD.
Attorneys for Defendants
30 North LaSalle Street - Suite 3922
Chicago, Illinois 60602-3333
312/236-3985

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, on oath state: I served a copy of the Agreed Motion for Entry of Protective Order by e-mailing a copy to the CMT System for the Northern District of Illinois on February 12, 2008.

S/ Joseph Cainkar